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FIRST MERCURY INSURANCE COMPANY

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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 AMERICAN GUARD SERVICES
INC., a California corporation,

12
13 Plaintiff,

14 v.
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16 FIRST MERCURY INSURANCE
COMPANY, an Illinois corporation;
17 and DOES 1 - 10, inclusive,

18 Defendants.
19
20

Case No. 2:15-cv-09259-MRW

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served: December 10, 2015
Current Response Date: December 31,
2015
New Response Date: January 29, 2016

Complaint Filed: December 1, 2015
Trial Date: None set

21 Defendant First Mercury Insurance Company and Plaintiff American Guard
22 Services Inc., by and through the undersigned counsel, and pursuant to Local Rule
23 8-3, hereby stipulate to a 30-day extension until Friday, January 29, 2016, for
24 Defendant to respond to Plaintiff's Complaint (Dkt #1). In support of this
25 Stipulation, the parties hereby state the following:

26 1. Plaintiff filed a Complaint (Dkt #1) against Defendant on December 1,
27 2015.

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2. Defendant was served with Summons and Complaint on December 10, 2015. As such, Defendant's response to the Complaint was due on December 31, 2015.

3. Defendant has requested and Plaintiff has agreed to a 30-day extension for the Defendant to file a responsive pleading in light of the number and complexity of issues in the case. This is Defendant's first request to extend time to respond to the complaint.

4. Local Rule 8-3 states, "A stipulation extending the time to respond to the initial complaint shall be filed with the Clerk. If the stipulation, together with any prior stipulations, does not extend the time for more than a cumulative total of thirty (30) days from the date the response initially would have been due, the stipulation need not be approved by the judge."

IT IS THEREFORE STIPULATED THAT: Defendant First Mercury Insurance Company will have through January 29, 2016, to file a response to Plaintiff's Complaint.

Konstantin Savransky attests that pursuant to L.R. 5-4.3.4(a)(2)(i), all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: January 7, 2016

CHRISTEN EHRET, LLP

By: /s/ Scott J. Sterling
 Scott J. Sterling
 Attorneys for Plaintiff American Guard
 Services, Inc.

DATED: January 7, 2016

GIBSON ROBB & LINDH, LLP

By: /s/ Konstantin Savransky
 Konstantin Savransky
 Attorneys for Defendant First Mercury
 Insurance Company